

I agree with the FCC's proposal to fully eliminate the Morse Code testing requirement. However, there is one issue that the comments have not yet raised.

Codeless Technicians should be granted Technician Plus privileges, and not doing so would be inconsistent with the reasoning behind the NPRM. During the time period in which the Codeless Technician license has been available, passing a Morse Code exam was the ONLY additional requirement for earning the HF privileges of the Novice and Technician Plus licensees. Before April 15th, 2000, passing the Novice exam was a prerequisite to earning a Codeless Technician license. Since April 15th, 2000, the content of the old Novice exam has been fully integrated into the content of the new Technician exam. The Codeless Technicians licensed in both time periods thus had to study the same rules and basic principles of HF operation that the Novice and Technician Plus licensees did.

There is also a practical reason for granting Technician Plus privileges to Codeless Technicians. Having non-uniform privileges for an entire class of licensees means having extra unofficial license classes. This can be a cause for confusion and make enforcement more difficult. The NPRM's proposal to fully eliminate the Morse Code testing requirement eliminates the confusion for Technicians interested in upgrading their licenses. However, failing to grant Technician Plus privileges to Codeless Technicians can still cause confusion for Technicians interested in using the HF privileges of Novice and Technician Plus licensees. In fact, this would still leave four different groups of Technician licensees:

1. Technician Plus licensees
2. Former Technician Plus licensees renewed as Technician licensees
3. Technician licensees with proof of passing a Morse Code exam
4. Codeless Technician licensees

The first three of these groups have HF privileges while the fourth does not. Having extra unofficial Technician license classes can not only cause confusion but also make enforcement of the rules more difficult, because the official license class does not make it clear which Technician licensees are authorized to use the HF bands and which ones do not.

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